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Washington, DC 20463

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MEMORANDUM

TO: The Commission

FROM: Anthony Herman
General Counsel

Kathleen Grith
Acting Associate General Counsel for Enforcement

BY: Peter G. Blumberg *PGB*
Assistant General Counsel

Audra Hale-Maddox *AHM*
Attorney

RE: MUR 6496 (NSSTA and NSSTA PAC)
Pre-Probable Cause Conciliation Agreement

Attached is a conciliation agreement signed by representatives of the National Structured Settlements Trade Association ("NSSTA") and the National Structured Settlements Trade Association Political Action Committee and Eric Vaughn, in his official capacity as treasurer, ("NSSTA PAC") that we recommend the Commission accept. See Attachment 1. The agreement would settle violations of 2 U.S.C. § 432(h) and 11 C.F.R. § 103.3(a), 2 U.S.C. § 441b(a), and 2 U.S.C. § 434(b)(1), (2), and (4), and 11 C.F.R. § 104.14(d), in connection with NSSTA PAC's failure to timely deposit certain contributions, its receipt of corporation contributions from NSSTA, and related and additional reporting errors.

The agreement recites the pertinent facts of this matter and contains admissions to violations of the Act and the Commission's regulations, as well as an agreement to cease and desist from further violations. In addition, Respondents agree to pay a civil penalty of \$4,000,

Therefore, we recommend that the Commission accept the signed conciliation agreement, approve the appropriate letters, and close the file.

RECOMMENDATIONS:

1. Accept the signed conciliation agreement;
2. Approve the appropriate letter; and
3. Close the file.

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